



National Organization of Nurse Practitioner Faculties

1522 K Street, NW, Ste. 702, Washington, D.C. 20005

Tel: (202) 289-8044 Fax: (202) 289-8046 E-mail: nonpf@nonpf.org

October 4, 2002

Timothy Muris
Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Mr. Muris:

The National Organization of Nurse Practitioner Faculties (NONPF) commends the Federal Trade Commission (FTC) for sponsoring a workshop on October 8-10, 2002, to address possible anticompetitive efforts that restrict competition on the Internet. This highly important issue deserves this timely consideration.

As an organization representing over 1100 faculty who prepare the future nurse practitioner workforce and who themselves maintain active clinical practices, we are significantly concerned over efforts that specifically limit the full potential benefit of nurse practitioner care to consumers. Consumers under the care of nurse practitioners are experiencing difficulties in accessing prescription medications from mail-order and Internet pharmacies. These difficulties range from flat refusal of prescriptions written by a nurse practitioner to lengthy delays in receiving prescriptions. Nurse practitioners are authorized to register with the DEA in most jurisdictions and to prescribe controlled substances within the purview of their state regulations; however, many mail-order and Internet pharmacy services ignore FDA guidelines and the state law or regulations of the provider and instead impose their own administrative criteria. These barriers limit many consumers to using only local pharmacies to receive prescriptions in a timely manner, resulting in higher costs to either the health plan or often the individual consumer. The patients of nurse practitioners, many who are underserved and under- or uninsured, need to have equal access to the less expensive mail-order and Internet pharmacy services.

We would refer you to the substantial comments submitted to the FTC by Westley Byrne, DrPH, NP and Harriet Hellman, NP for further elaboration on this issue. As well, we understand that

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Harriet Hellman will participate on the workshop panel addressing “Telemedicine and Online Pharmaceutical Sales” to describe the problems NPs are facing with regard to interstate prescribing. We anticipate that the discussions generated during this panel and the entire workshop will be helpful to the FTC in maintaining its important role of protecting the consumer.

We thank you for your serious consideration of this issue and urge your action to protect the consumer’s choice of pharmacy services and health care provider.

Sincerely,

Diane C. Viens, DNSc, CFNP
President